

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

SECURITIES AND EXCHANGE	§	
COMMISSION,	§	
	§	Civil Action No. 3:16-cv-1417
Plaintiff,	§	
	§	
vs.	§	
	§	Related Case No. 3:17-cv-1106
ASH NARAYAN, THE TICKET	§	
RESERVE INC. a/k/a FORWARD	§	
MARKET MEDIA, INC., RICHARD M.	§	
HARMON, and JOHN A. KAPTROSKY	§	
	§	
Defendants.	§	

**SPECIAL RECEIVER’S MOTION TO APPROVE
PAYMENT OF HER FEES AND COSTS**

Ferdose al-Taie, Special Receiver for The Ticket Reserve, Inc., files this motion to approve payment of her fees and costs, and respectfully shows the Court as follows:

FACTS

1. On April 12, 2018, Receiver Michael Napoli filed his Motion for Appointment of Special Receiver seeking approval for the appointment of Ferdose al-Taie as Special Receiver to oversee the Receivership Estate’s pursuit of claims and defenses against CBS Corporation through trial, settlement or other resolution. (Doc. 181.) On April 16, 2018, the Court granted his motion. (Doc. 182.) As Special Receiver, Ferdose al-Taie pursued the litigation against CBS Corporation for which she was appointed by this Court in the related case, 3:17-cv-1106. That civil action was resolved through a confidential settlement agreement, which the Special Receiver moved this Court to approve on April 8, 2019 (3:17-cv-1106, Doc. 75), along with her Motion for Attorney Fees and Costs (3:17-cv-01106, Docs. 77, 78). This Court approved the

settlement (3:17-cv-01106, Doc. 81), and it granted the Special Receiver's motion for attorney fees and costs (3:17-cv-01106, Docs. 79-80).

2. Receiver Michael Napoli was paid the settlement funds by CBS Corporation, and the Special Receiver and CBS Corporation stipulated to this Court's dismissal with prejudice (3:17-cv-01106, Doc. 85). The Clerk terminated the civil action on April 24, 2019. The Special Receiver's duties are now concluded. Thus, the Special Receiver moves this Court for payment of her fees and costs from the settlement she obtained with CBS Corporation, and notes that this is, and will be, the only such motion for her work in obtaining the significant settlement in 3:17-cv-1106, the litigation against CBS Corporation.

3. The Special Receiver expended 213.7 hours on this matter at her reduced hourly rate of \$445.50,¹ and a paralegal expended less than 2 hours on this matter at her reduced hourly rate of \$211.50, for total requested billable hour compensation of \$ 96,545.25. Expenses for this case (largely, travel expenses by the Special Receiver to conduct witness interviews) added another \$2,820.76. The Special Receiver requests total compensation of \$99,366.01. The invoices in Exhibit A provide detailed itemized fees and costs reflecting this total.

4. As shown in the Special Receiver's Certification, attached as Exhibit B, her rate, the amount of time she devoted to this matter, and the result obtained, all support the granting of this motion.

5. Receiver Michael Napoli has reviewed this motion and supports it. The Securities and Exchange Commission has reviewed this motion and does not oppose it.

¹ The Special Receiver's standard rate was \$515.00 per hour, and the \$445.50 rate requested represents a 10% discount from her standard rate.

PRAYER

The Special Receiver prays that this Court approve this motion to grant total compensation of \$99,366.01 payable to Dykema Gossett PLLC.²

Respectfully submitted,

By: /s/ Ferdose al-Taie

Ferdose al-Taie
TX Bar No. 24106644

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FERDOSE AL-TAIE
SPECIAL RECEIVER IN 3:17-cv-01106

CERTIFICATE OF SERVICE

I certify that on August 28, 2019, I electronically filed the foregoing with the Clerk of the U.S. District Court for the Northern District of Texas, using the CM/ECF system, which sent a Notice of Electronic Filing to all counsel of record.

/s/ Brooke Rollins

² Since performing the work which is the subject matter of this motion, the Special Receiver changed law firms. However, all of the work for which compensation is now sought was performed by the Special Receiver when she was employed at Dykema Gossett PLLC. As such, if this motion is granted, the Special Receiver's fees and costs will be paid by Receiver Michael Napoli to Dykema PLLC.